



MEMORANDUM NOTE DE SERVICE

To
À Candace Salmon
Commission Registrar, CNSC

From
De Andrew McAllister,
Acting Director General, DNCFR, CNSC

Security Classification - Classification de sécurité UNCLASSIFIED – NON CLASSIFIÉ
Our File – Notre référence e-Doc 7487982 (Word) e-Doc 7490857 (PDF)
Date: March 31, 2025

Subject
Objet **CNSC Staff's Review of Nordion's March 6, 2025, Request for Confidentiality of Material Submitted in Relation to Renewal of Nordion Operating Licence**

PURPOSE/OBJECTIF

The purpose of this memorandum is to provide CNSC staff's comments and recommendations to the Commission regarding the matter of Nordion (Canada) Inc. (Nordion) request to protect from public disclosure the documents submitted in the request for confidentiality:

[Request for Confidentiality of Materials Submitted in Relation to Renewal of Nordion Operating Licence. Submitted to CNSC staff on March 6, 2025. \(e-Doc 7476395\)](#)

The CNSC registry subsequently requested that CNSC staff provide its advice to the Commission on the matter.

DISCUSSION

To CNSC staff's knowledge, Nordion's documents provided in the confidentiality request have not been made available elsewhere. These documents have consistently been treated as confidential in CNSC staff's dealings with the licensee.

CNSC staff reviewed the list of documents Nordion deemed to be confidential. This list and related details provided by Nordion along with the CNSC staff comments are included in Table 1. Ten of the documents were provided with redacted versions and 8 others the entire content was listed as confidential, and summaries provided.

In all cases of the redacted versions, CNSC staff found that the version provided was acceptable and content that was removed was either personal, commercial or security sensitive material.

The summaries provided for the documents that were entirely withheld provide acceptable summaries to describe these documents.

RECOMMENDATION/RECOMMANDATION

CNSC staff have reviewed Nordion's requests for confidentiality and have provided recommendations as to whether the proposed public summaries and redacted versions are accurate representations of the documents in question. The redacted versions as well as the proposed public summaries meet the requirements for confidential materials.

CNSC staff recommend the Commission accept the proposed confidentiality request from Nordion.

Prepared by:

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Directorate of Nuclear Cycle and Facilities Regulation

Approved by:

Andrew McAllister

Acting Director General, Directorate of Nuclear Cycle and Facilities Regulation

Table 1: Material to be Deemed Confidential					
	Item Name	Portion(s) to be Deemed Confidential	Reason for Request	Reason for Request Details	CNSC Staff Comments
1.	CP-001, Calibration Master Plan	<input type="checkbox"/> Entire content <input checked="" type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input checked="" type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input checked="" type="checkbox"/> other nature (specify), security sensitive. and is consistently treated as confidential and the person affected has not consented to disclosure.	formation relating to generation of work orders and calibration forms are considered commercial information. Nordion has spend considerable time and money to develop these specific programs and release of the information could be used by competitors to the detriment of Nordion's competitive advantage. Information could also be potentially used by bad actors looking to disrupt the site and safety equipment. Provide a redacted version to the public.	CNSC staff find that Nordion's rationale to withhold commercial and technical sensitive portions of this document is sufficient. Nordion's proposed redacted version has sections removed that does not affect the purpose of the procedure.
2.	SE-EHS-009, EHS Regulatory Reporting and Notifications	<input type="checkbox"/> Entire content <input checked="" type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input checked="" type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.	Names and email addresses removed. Consent has not been received to release these. Provide a redacted version to the public.	CNSC staff find that Nordion's rationale to withhold personal sensitive portions of this document is sufficient. Nordion's proposed redacted version has sections removed that does not affect the purpose of the procedure.
3.	SE-ENV-015, Nordion Environmental Protection Program	<input type="checkbox"/> Entire content <input checked="" type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or	Name of supplier removed. Consent has not been received to release this. Provide a redacted version to the public.	CNSC staff find that Nordion's rationale to withhold commercial sensitive portions of this document is sufficient. Nordion's proposed redacted version has sections removed that does not affect the purpose of the procedure.

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			<input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.		
4.	SE-ERP-001, Fire Safety Plan	<input type="checkbox"/> Entire content <input checked="" type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input checked="" type="checkbox"/> personal nature, or <input checked="" type="checkbox"/> other nature (specify): security sensitive and is consistently treated as confidential and the person affected has not consented to disclosure.	Personnel telephone numbers should not be released. Consent has not been received to release this private information. Facility drawings should not be released as they could be used by bad actors looking to disrupt the site. Provide a redacted version to the public.	CNSC staff find that Nordion's rationale to withhold personal and security sensitive portions of this document is sufficient. Nordion's proposed redacted version has sections removed that does not affect the purpose of the procedure.
5.	SE-ERP-002, Emergency Response Plan	<input type="checkbox"/> Entire content <input checked="" type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input checked="" type="checkbox"/> personal nature, or <input checked="" type="checkbox"/> other nature (specify): security sensitive and is consistently treated as confidential and the person affected has not consented to disclosure.	Details of Nordion's emergency response locations and locations of response equipment storage could be potentially used by bad actors looking to disrupt the site. Consent has not been received to release the personnel information (names and telephone numbers). Provided a redacted version to the public.	CNSC staff find that Nordion's rationale to withhold personal and security sensitive portions of this document is sufficient. Nordion's proposed redacted version has sections removed that does not affect the purpose of the procedure.
6.	SE-LIC-007, EHS Committee Approved Activity Limits for Facilities	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.	This document provides details on the type, quantity, and location of radioisotopes allowed in the facility. Such information is commercial confidential as it could be used by competitors to the detriment of Nordion's competitive advantage. In addition, the information is security sensitive as it could provide information to bad actors on the potential types and quantities of radioactive material that may be on-site. Withhold the entire document and provide a summary.	CNSC staff find that Nordion's rationale to withhold the entire document is sufficient. Nordion's s proposed public summary presents an accurate summary of the document in question.

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	Item Name	Portion(s) to be Deemed Confidential	Reason for Request	Reason for Request Details	CNSC Staff Comments
7.	SE-LIC-009, Preliminary Decommissioning Plan for Class 1B Facility	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input checked="" type="checkbox"/> other nature (specify): security sensitive and is consistently treated as confidential and the person affected has not consented to disclosure.	This document provides details on Nordion's facility and operations. Such information is commercial confidential as it could be used by competitors to the detriment of Nordion's competitive advantage. In addition, the information is security as it provides detailed information on Nordion's operations that could be used by bad actors looking to disrupt the site. Withhold the entire document and provide a summary.	CNSC staff find that Nordion's rationale to withhold the entire document is sufficient. Nordion's proposed public summary presents an accurate summary of the document in question.
8.	SE-LIC-010, Nordion Public Information Program	<input type="checkbox"/> Entire content <input checked="" type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input checked="" type="checkbox"/> personal nature, or <input checked="" type="checkbox"/> other nature (specify), attorney-client privilege and is consistently treated as confidential and the person affected has not consented to disclosure.	Consent has not been received to release this personnel information (names and emails). Text indicating legal approval required is subject to attorney client privilege as it reflects legal advice. Provided a redacted version to the public.	CNSC staff find that Nordion's rationale to withhold sensitive portions of this document due to attorney-client privilege is sufficient. Nordion's proposed redacted version has sections removed that does not affect the purpose of the procedure.
9.	SE-LIC-015, Radioactive Material Inventory	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify): security sensitive and is consistently treated as confidential and the person affected has not consented to disclosure.	This document provides details on the type of radioisotopes potentially in the facility and room locations. This information is security sensitive as it provides information to bad actors on the potential types, quantities, and locations of radioactive material that may be on-site. The document also contains Information relating to details on how to operate Nordion's database system for tracking radioactive material, and supplier or customer names. Such information is commercial confidential as it could be used by competitors to the detriment of Nordion's competitive advantage. Provided a redacted version to the public.	CNSC staff find that Nordion's rationale to withhold commercial and security sensitive portions of this document is sufficient. Nordion's proposed redacted version has sections removed that does not affect the purpose of the procedure. This was incorrectly listed that the entire content is confidential, but a redacted version was provided and not a summary.

10.	SE-RP-001, Radiation Protection Manual – Ottawa site	<div>✓ Entire content*</div> <div><input type="checkbox"/> Redacted content as shown</div> <div>* Nordion incorrectly listed that the entire content is confidential, but a redacted version was provided and not a summary.</div>	<div><input type="checkbox"/> The information is a matter of national or nuclear security</div> <div><input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)</div> <div>The information is of a:</div> <div><input type="checkbox"/> financial nature,</div> <div>✓ commercial nature,</div> <div><input type="checkbox"/> scientific nature,</div> <div><input type="checkbox"/> technical nature,</div> <div><input type="checkbox"/> personal nature, or</div> <div><input type="checkbox"/> other nature (specify): security sensitive and is consistently treated as confidential and the person affected has not consented to disclosure.</div>	<div>This document provides details on the monitoring system Nordion has implemented, including room locations and specific tags for material leaving the active area. Such information is commercial confidential as it could be used by competitors to the detriment of Nordion’s competitive advantage. Information is also security sensitive as it could also potentially be used by bad actors looking to disrupt the site and safety equipment. Provided a redacted version to the public.</div>	<div>CNSC staff find that Nordion’s rationale to withhold commercial and security sensitive portions of this document is sufficient.</div> <div>Nordion’s proposed redacted version has sections removed that does not affect the purpose of the procedure.</div>
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11.	SE-RP-003, Investigations	<input type="checkbox"/> Entire content <input checked="" type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.	This document provides a screenshot of a Nordion developed database to track incidents. Such information is commercial confidential as it could be used by competitors to the detriment of Nordion's competitive advantage. Provided a redacted version to the public.	CNSC staff find that Nordion's rationale to withhold commercial and security sensitive portions of this document is sufficient. Nordion's proposed redacted version has one section removed that does not affect the purpose of the procedure.
12.	REP-EHS-054, Code Compliance Review for Nordion (Canada) Inc.	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify): security sensitive and is consistently treated as confidential and the person affected has not consented to disclosure.	This document provides details on Nordion's facility and operations. Such information is commercial confidential as it could be used by competitors to the detriment of Nordion's competitive advantage. In addition, the information is security sensitive as it provides detailed information to bad actors on Nordion's operations. Withhold the entire document and provide a summary.	CNSC staff find that Nordion's rationale to withhold commercial and security sensitive portions of this document is sufficient. This document is provided by an outside contractor and specific to the Nordion facility. Nordion's proposed public summary presents an accurate summary of the document in question.
13.	SE-EHS-017, Fire Hazard Assessment	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or	This document provides details on Nordion's facility and operations. Such information is commercial confidential as it could be used by competitors to the detriment of Nordion's competitive advantage In addition, the information is security sensitive as it provides detailed information to bad actors on Nordion's operations. Withhold the entire document and provide a summary.	CNSC staff find that Nordion's rationale for providing a summary to withhold commercial and security sensitive information in this document is sufficient and acceptable. This document is provided by an outside contractor and specific to the Nordion facility. Nordion's proposed public summary presents an accurate summary of the document in question.

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14.	IS/SR 1057 Z000, FSAR Cobalt Operations	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify): security sensitive and is consistently treated as confidential and the person affected has not consented to disclosure.	This document provides details on Nordion's facility and operations. Such information is commercial confidential as it could be used by competitors to the detriment of Nordion's competitive advantage. In addition, the information is security sensitive as it provides detailed information to bad actors on Nordion's operations and accident scenarios. Withhold the entire document and provide a summary.	CNSC staff find that Nordion's rationale for providing a summary to withhold commercial and security sensitive information in this document is sufficient and acceptable. The document describes systems, structures and components (SSCs) that are important to safety and credited during abnormal events. Nordion's proposed public summary presents an accurate summary of the document in question.
15.	IN/SR 2638 Co60, FSAR Cobalt Pools	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify): security sensitive and is consistently treated as confidential and the person affected has not consented to disclosure.	This document provides details on Nordion's facility and operations. Such information is commercial confidential as it could be used by competitors to the detriment of Nordion's competitive advantage. In addition, the information is security sensitive as it provides detailed information to bad actors on Nordion's operations and accident scenarios. Withhold the entire document and provide a summary	CNSC staff find that Nordion's rationale for providing a summary to withhold commercial and security sensitive information in this document is sufficient and acceptable. The document describes the safety principles, safety and control measures, and administrative controls associated with operation of the storage pools in the Cobalt Operations Facility. The document describes systems, structures and components (SSCs) that are important to safety and credited during abnormal events. Nordion's proposed public summary presents an accurate summary of the document in question.
16.	REP-EHS-009, Nordion Class 1B Facility Derived Release Limits	<input type="checkbox"/> Entire content <input checked="" type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify): security sensitive and is consistently treated as confidential and the person affected has not consented to disclosure.	Information related to alarm monitoring is security sensitive as it could potentially be used by bad actors looking to disrupt the site. Provide a redacted version to the public	CNSC staff find that Nordion's rationale to withhold commercial and security sensitive portions of this document is sufficient. This document is provided by an outside contractor and specific to the Nordion facility. Nordion's proposed redacted version has sections removed that does not affect the purpose of the procedure.

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17.	SE-LIC-001, Management System for Safety	<input type="checkbox"/> Entire content <input checked="" type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input checked="" type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.	Names and email addresses removed. Consent has not been received to release these. Provide a redacted version to the public.	CNSC staff find that Nordion's rationale to withhold information personal in nature in this document is sufficient. Nordion's proposed redacted version has one section redacted that does not affect the purpose of the procedure.
18.	CITY OF OTTAWA PROPERTY TAX	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input checked="" type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input checked="" type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.	This document contains financial information related to taxes. Such information is not publicly disclosed. Document contains names of employees who have not provided consent to release. Withhold the entire document.	CNSC staff find that Nordion's rationale to withhold tax information regarding the licence renewal application is acceptable.